

Exhibit 71

Miller Deposition

Robert Miller

Pages: 21

Dated: January 28, 2021

Robert Miller

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHARLES JOSEPH FREITAG,	:	NO. 2:19-cv-05750-JMG
JR., as Administrator of	:	
the ESTATE OF CHARLES	:	
JOSEPH FREITAG, SR.,	:	
Plaintiff	:	
	:	
vs.	:	
	:	
BUCKS COUNTY; PRIMECARE	:	CIVIL ACTION - LAW
MEDICAL, INC.; STEPHAN	:	
BRAUTIGAM, PMHNP;	:	
JESSICA MAHONEY, PSY.D.;	:	
AVIA JAMES, LPC;	:	
CHRISTINA PENGE, LPC;	:	
CORRECTIONAL OFFICER	:	
MOODY; CORRECTIONAL	:	
OFFICER MURPHY; and	:	JUDGE JOHN M. GALLAGHER
CORRECTIONAL OFFICER	:	
YOUNG,	:	
Defendants	:	

ZOOM DEPOSITION OF ROBERT MILLER

DATE AND TIME: Thursday, January 28, 2021
at 2:30 p.m.

KAPLAN LEAMAN & WOLFE
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Robert Miller

Page 21

1 A. No.

2 Q. Did you have any concerns after the
3 sentencing that he may be at risk to harm himself?

4 A. Excuse me.

5 Q. Certainly.

6 A. Yes, I did.

7 Q. And did you communicate those concerns to
8 anyone?

9 A. I -- I went to the sentencing with
10 another friend of ours. And on the way home -- I
11 believe it was on a Friday --

12 Q. I believe you're right.

13 A. -- I -- I -- I said to the individual
14 who -- as I was driving home, I said, he's never gonna
15 make it.

16 Q. Did you convey that concern to any
17 members of his family or to his Counsel or to anyone at
18 the Correctional Facility?

19 A. No. We weren't at the Correctional
20 Facility. It was after the sentencing driving home.

21 Q. I understand that, but you didn't call or
22 anything like that to the Correctional --

23 A. No, no, no.

24 Q. And, sir, please don't think there's any
25 criticism. I'm just asking to make sure. Okay? When